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**RICHARD A. DEVINE**  
STATE'S ATTORNEY

**OFFICE OF THE STATE'S ATTORNEY**  
COOK COUNTY, ILLINOIS

**PUBLIC INTEREST BUREAU**  
69 WEST WASHINGTON  
CHICAGO, ILLINOIS 60602  
Phone: (312) 603-8600

August 24, 1999

**VIA EXPRESS MAIL**

Maggie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**RECEIVED**  
**AUG 26 1999**  
**FCC MAIL ROOM**

**RE: In The Matter of Numbering Resource Optimization**  
**CC Docket No. 99-200**

Dear Ms. Salas:

Enclosed please find an original and five copies of the Motion for Extension of Time to File Reply Comments on Notice of Proposed Rulemaking in the above-entitled docket, filed on behalf of the Cook County State's Attorney's Office. Included also are a Notice of Filing and Certificate of Service. Please return a date-stamped copy of this document in the enclosed, self-addressed, stamped envelope.

If you have any questions regarding this document, please do not hesitate to contact me.

Sincerely,

**RICHARD A. DEVINE**  
State's Attorney of Cook County

BY:

*David L. Heaton*  
David L. Heaton  
Assistant State's Attorney  
Environment & Energy Division  
69 W. Washington, Suite 700  
Chicago, Illinois 60602  
312-603-8627

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED

AUG 26 1999

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CC Docket No. 99-2004

In the Matter of )

Numbering Resource Optimization )

Connecticut Department of Public Utility )

Control Petition for Rulemaking to Amend )

The Commission's Rule Prohibiting Technology )

Specific or Service-Specific Area Code Overlays )

RM No. 9258

Massachusetts Department of )

Telecommunications and Energy Petition )

For Waiver to Implement a Technology-Specific )

Overlay in the 508, 617, 781 and 978 Area Codes )

NSD File No. L-99-17

California Public Utilities Commission and )

The People of the State of California )

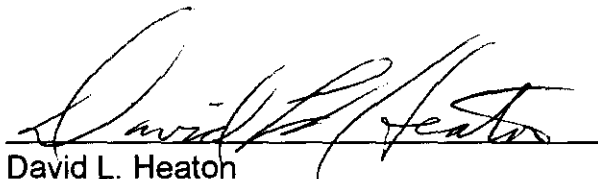
Petition for Waiver to Implement A Technology- )

Specific or Service-Specific Area Code )

NSD File No. L-99-36

**NOTICE OF FILING**

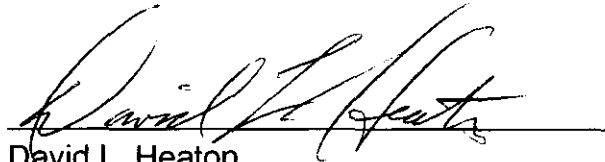
**PLEASE TAKE NOTICE** that we have this 24<sup>th</sup> day of August filed with the Secretary of the Federal Communications Commission, 445 12<sup>th</sup> Street, S.W., Washington, D.C. 20554, the enclosed Motion for Extension of Time to File Reply Comments on Notice of Proposed Rulemaking of the Cook County State's Attorney's Office, in the above-captioned proceeding.



David L. Heaton  
Assistant State's Attorney

## CERTIFICATE OF SERVICE

I, DAVID L. HEATON, hereby certify that I caused copies of the foregoing Motion for Extension of Time to File Reply Comments on Notice of Proposed Rulemaking to be served upon Maggie Roman Salas, Secretary of the Federal Communications Commission, by overnight express mail, on August 24, 1999.

A handwritten signature in black ink, appearing to read "David L. Heaton", is written over a horizontal line.

David L. Heaton  
Assistant State's Attorney

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	CC Docket No. 99-200
Numbering Resource Optimization	)	
Connecticut Department of Public Utility	)	
Control Petition for Rulemaking to Amend	)	
The Commission's Rule Prohibiting Technology	)	RM No. 9258
Specific or Service-Specific Area Code Overlays	)	
Massachusetts Department of	)	
Telecommunications and Energy Petition	)	
For Waiver to Implement a Technology-Specific	)	NSD File No. L-99-17
Overlay in the 508, 617, 781 and 978 Area Codes	)	
California Public Utilities Commission and	)	
The People of the State of California	)	
Petition for Waiver to Implement A Technology-	)	NSD File No. L-99-36
Specific or Service-Specific Area Code	)	

**MOTION FOR EXTENSION OF TIME  
TO FILE REPLY COMMENTS ON  
NOTICE OF PROPOSED RULEMAKING**

**NOW COMES** the Cook County State's Attorney's Office, ex. rel., RICHARD A. DEVINE, State's Attorney, pursuant to 47 CFR Ch. 1, Section 1.46 (b), and respectfully requests that the Federal Communications Commission ("Commission") grant it leave to submit its Motion for Extension of Time to File Reply Comments on Notice of Proposed Rulemaking in the above-captioned proceeding. In support of this Motion we state the following:

1. On May 27, 1999, this Commission adopted its Notice of Proposed Rulemaking ("NOPR") in the instant docket, requesting comments on a large variety of issues associated with telephone number administration, the North American Numbering Plan and the current number exhaust crisis. The NOPR established a July 30, 1999 day for filing Initial Comments on Notice of Proposed Rulemaking, and set an August 30<sup>th</sup> deadline for filing Replies.

2. For almost three months, attorneys and experts working on behalf of this Office have been preparing a comprehensive and detailed proposal for nationwide number optimization, based upon our successful implementation of number conservation and number pooling here in Illinois.

3. In this proceeding, the Cook County State's Attorney's Office is represented by the same attorneys who are also representing this Office in the SBC-Ameritech merger proceedings currently before the Illinois Commerce Commission.

4. The State's Attorney's Office is using its best efforts to meet the August 30<sup>th</sup> deadline for filing Reply Comments in this proceeding. However, given the voluminous amount of materials already filed by the many parties to this proceeding in their Initial Comments, and our desire to carefully consider, analyze, and address these other parties' Comments, we may experience difficulty in meeting the August 30<sup>th</sup> deadline.

5. In view of the Commission's special limited grant of number administration authority given to Illinois to implement our number conservation and pooling proposal in

five Chicago area NPAs, as set forth in the FCC's *Pennsylvania Numbering Order* of September 28, 1998, we believe the Commission and interested parties would significantly benefit from an accounting of the Illinois experience with number conservation and number pooling.

6. Further, a brief extension of time to file our Reply Comments, no more than seven days, until September 6, 1999, would not result in prejudice to any party.

7. This request for an Extension of Time to File Reply Comments is not intended to delay these proceedings.

**WHEREFORE**, the Cook County State's Attorney's Office respectfully requests that the Federal Communications Commission grant our request for an Extension of Time to File Reply Comments in this proceeding until no later than September 7, 1999.

Sincerely,

**RICHARD A. DEVINE**  
State's Attorney of Cook County, Illinois


By: 

David L. Heaton  
Assistant State's Attorney  
Environment & Energy Division  
69 W. Washington, Suite 700  
Chicago, Illinois 60602  
312-603-8627

STATE OF ILLINOIS       )  
                                      )  
COUNTY OF C O O K     )       SS.

**VERIFICATION**

DAVID L. HEATON, being first duly sworn on oath, states that he is an Assistant State's Attorney, that he has read the attached Motion for Extension of Time to File Reply Comments on Notice of Proposed Rulemaking, and that the facts therein are true to the best of his knowledge, information, and belief.

  
David L. Heaton  
Assistant State's Attorney

SUBSCRIBED AND SWORN TO  
BEFORE ME THIS 24<sup>th</sup> DAY OF  
AUGUST, 1999.

  
NOTARY PUBLIC

